

*Exhibit C*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

MARIA ALSINA ORTIZ, ET AL.

Plaintiffs

vs.

ZOE LABOY, ET AL.

Defendants

CIVIL NO. 98-1893 (SEC)

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 26  
OF PLAINTIFFS' REQUEST  
FOR PRODUCTION AND COPY OF DOCUMENTS**

**TO:** Plaintiff Maria Alsina Ortiz, on her own behalf and as heir to decedent Orlando Ocasio Alsina, through her counsel of record **Glenn Carl James**, La Torre de Plaza, Suite 617, 525 F.D. Roosevelt Avenue, San Juan, Puerto Rico 00918.

Codefendants Zoé Laboy, Emilio Castillo and Sixto Marrero supplement their response to Request No. 26 as follows:

**1. Response to Request No. 26 is the following:**

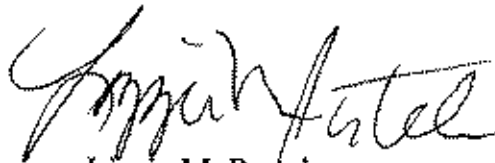
Appearing defendants will use as expert witness Dr. Glenn Garayalde Cotroneo, neurologist. Joined hereto, Dr. Garayalde's Curriculum Vitae. As soon as the expert report is available it will be served upon plaintiff.

I HEREBY CERTIFY, that on this date served a copy of the foregoing pleading by United States mail, properly addressed, and bearing first class postage to **Leticia**

**Ramírez Rangel, Esq.**, Federal Litigation Division, Department of Justice, P.O. Box  
9020192, San Juan, P.R. 00902-0192.

In San Juan, Puerto Rico, this 31<sup>st</sup> day of March 2000.

**SMITH & NEVARES**  
Counsel for codefendants  
Zoé Laboy, Emilio Castillo and  
Sixto Marrero  
P.O. Box 13667  
San Juan, P.R. 00908-3667  
Telephone: (787) 722-9333  
Fax: (787) 721-8820

A handwritten signature in dark ink, appearing to read 'Lizzie M. Portela', is written over the typed name.

Lizzie M. Portela  
USDC 208401



*Glenn Garayalde Cotroneo, M.D.*  
NEUROLOGIST

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### CURRICULUM VITAE

Name:	Glenn Garayalde Cotroneo, M.D.	Sex:	Male
Date of Birth:	September 2, 1952	Phone:	Home 281-8179
Place of Birth:	Summit, New Jersey	SS#: 583-50-9140	
Marital Status:	Married: Wife: Linda Warrell	Children:	4 Danielle Frances Tatiana Marie Stephanie Alexis Victoria Alejandra
Addresses:	1. San Juan Veterans Admin. Hospital - Medical Center One Veterans Plaza San Juan, Puerto Rico 00927-5800	Phone:	758-7575 ext. 3311
	2. Condo. Ada Ligia 1452 Ashford Avenue, Site D-1 Condado San Juan, Puerto Rico 00907	Phone:	723-1735
	3. Mailing Address: P. O. Box 361976 San Juan, Puerto Rico 00936-1976	Fax:	723-1736

### EDUCATION and DEGREE:

University of Puerto Rico	BS Magna Cum Laude	1973
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### MEDICAL SCHOOL:

University of Puerto Rico	Medical Doctor	1977
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### INTERNSHIP:

San Juan Veterans Admin. Medical Center	Internal Medicine	1977-78
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RESIDENCY, FELLOWSHIPS AND POST GRADUATE TRAINING:

- |                                 |   |         |
|---------------------------------|---|---------|
| 1. Neurology Training Program   | UPR School of Medicine                    | 1978-79 |
| 2. Neurology Training Program   | Boston University<br>Boston City Hospital | 1979-80 |
| 3. Teaching Fellow in Neurology | Boston University<br>School of Medicine   | 1979-82 |

License to Practice Medicine:

Puerto Rico

Lic. #6289

October 21, 1981

Military Service:

N/A

Specialty: NeurologyCertification by American Board in Medical Specialty:

Board Eligible

Hospital Affiliations:

1. San Juan Veterans Administration Medical Center, Staff Neurologist, 1982 to present.
2. San Jorge Hospital, Consultant in Neurology, 1982, to present.
3. Ashford Presbyterian Community Hospital, Consultant in Neurology, 1984, to present.

Professional Experience:

1. San Juan Veterans Medical Center, Staff Neurologist, 1982 to present.
2. Neurological Evaluator, Disability Determination Program of the Department of Social Services, 1983 to present.
3. Private Practice, Neurologist, Institute of Neurology, Metropolitan Hospital, 1984 to October 1988.

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4. Neurological Consultant, Cooperativa de Seguros de Vida de Puerto Rico, 1984 to present.
5. Private Practice, Neurologist, Ashford Cardiovascular Physiologic & Nuclear Lab, Ashford Presbyterian Community Hospital, November 1988 to present.

Academic Appointments:

1. Teaching Fellow in Neurology, Boston University School of Medicine, 1979 to 1982.
2. Associate Professor of Neurology, University of Puerto Rico School of Medicine, from 1 July 1991.
3. Lecturer in Neurology, Universidad Central del Caribe, from 1982 to the present.

Administrative Appointments:

1. Director, Continuing Medical Education Committee, Metropolitan Hospital, 1986.
2. Member, Executive Committee, Metropolitan Hospital, 1986.
3. Consultant Neurologist, Office of District Counsel-San Juan Veterans Administration Medical Center and U.S. Virgin Islands, 1990.
4. Member, Continuing Medical Education Committee, Ashford Presbyterian Community Hospital, Oct. 1990.

Honors and Awards:

1. Bauch and Lomb Honorary Science Award 1969
2. First Prize Scientific Award for the Presentation of Research Paper on Solar Eclipse at the Department of Physical Sciences, University of Puerto Rico, March 1970.
3. Member, Beta Beta Beta Biology Honor Society, University of Puerto Rico since 1971.
4. Letter of Commendation from the Acting Director, San Juan Veterans Administration, for organizing the 20th Anniversary Celebration of the San Juan Veterans Administration, 1987.

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Membership in Medical, Professional and Scientific Societies:

1. Puerto Rico Alliance Against Venereal Disease, 1974 to 1979.
2. American Medical Association, 1975, to present.
3. Puerto Rico Medical Association, 1977, to present.
4. American Academy of Neurology, 1982, to present.
5. Massachusetts Neurological Society, 1979, to 1983.
6. Academia Puertorriqueña de Neurología, 1982, to present.
7. National Association of Disability Evaluating Physicians, 1983, to present.
8. American Society of Neuroimaging, 1989 to present.
9. American Heart Association Stroke Council, appointed Fellow 1991

Teaching Experience:

1. Teaching Fellow in Neurology, Boston University, 1979 to 1982.
2. Associate Professor, University of Puerto Rico School of Medicine, from 1982 to June 1991.
3. Lecturer in Neurology, Universidad Central del Caribe, 1982, to 1990.
4. Lecturer in Neurology, Tropical Medicine Class, Naval School of Health Sciences, Bethesda Detachment, San Juan Veterans Administration Medical Center, from 1989 to present.
5. Associate Professor of Neurology, University of Puerto Rico School of Medicine, since July 1, 1991

Research Experience:

Research designed to evaluate renal involvement in Multiple Myeloma disease, under the supervision of Dr. Manuel Martinez Maldonado, Chief, Medical Service, San Juan Veterans Administration Hospital.

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Post Graduate: Graduate Courses: Seminars and Workshops Attended:

- |     |   |   |                           |
|-----|---|---|---------------------------|
| 1.  | Management of Stroke & Neuro Trauma Patients  | Palmas del Mar Humacao, P.R.  | Jan. 25-28, 1983          |
| 2.  | Primera Conferencia de Epilepsia del Caribe   | San Juan, P. R.   | Nov. 6, 1983              |
| 3.  | Biological Aspects of Dyslexia  | San Juan, P. R.   | Feb. 9, 1984              |
| 4.  | Second Conference of Clinical Evoked Potentials   | P. R. Medical Association   | Feb. 7-8, 1985            |
| 5.  | Clinical & Basic Neurology  | Harvard Medical School, Boston, MS  | Mar. 4-11, 1985           |
| 6.  | Training for Medical Evaluation for Disability Claims   | P. R. Medical Association   | Nov. 8-12, 1985           |
| 7.  | Sleep Disorders Medicine  | Henry Ford Hospital Detroit, Michigan                                     | Aug. 22, to Sept. 1, 1986 |
| 8.  | Transcranial and Neurovascular Doppler  | Bowman Gray School Of Medicine, Wake-Forest University, Winston-Salem, NC | Jan. 23-31, 1989          |
| 9.  | Interdisciplinary Management of Swallowing Disorders  | Northport Regional Medical Education Center, Northport, New York          | Aug. 28-30 1990           |
| 10. | Diagnosis and Treatment of Swallowing Disorders; Dysphagia course in PR Northwestern University, Illinois | University Puerto Rico Medical Sciences Campus                            | Feb. 16 - 17, 1991        |

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|-----|---|--|---------------------------|
| 11. | The First Management Development Training Program; Management Training Center, Richmond, Virginia | Hotel Sands<br>San Juan, PR                | April 28 -<br>May 2, 1991 |
| 12. | FUSE Project Conference, "Facility Undertakings to Strengthen Education"                          | Hotel Condado Plaza, San Juan, Puerto Rico | July 23 -<br>24, 1991     |
| 13. | Parkinsons Disease Collaborative Research Conference  | Four Seasons Hotel<br>Dallas, Texas        | Jan 10-11<br>1992         |

Participation in Special Committees, Boards, Academic Senates and Advisory Councils:

- |    |   |                    |
|----|---|--------------------|
| 1. | Member, Resident Selection to Neurology Program, University of Puerto Rico School of Medicine.            | 1985 to<br>1990    |
| 2. | Member, Employee of the Month Selection Committee, San Juan Veterans Hospital                             | 1987               |
| 3. | Chairperson, Employee of the Month Committee, San Juan Veterans Hospital                                  | Jan, 1987          |
| 4. | Chairperson, Dysphagia Working Group<br>San Juan Veterans Hospital  | Feb. 1987          |
| 5. | Chairperson, Committee to Celebrate the 20th Anniversary of the San Juan Veterans Administration Hospital | Oct. 1987          |
| 6. | Chairperson, Safety Training & Awareness Subcommittee, San Juan Veterans Administration Medical Center    | 1990               |
| 7. | Chairperson, Committee to Celebrate the 21st Anniversary of the San Juan Veterans Administration Hospital | Oct. 1990          |
| 8. | Member Veterans Administration Voluntary Service Staff Advisory Committee                                 | 1990 to<br>present |



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9. Member, Strategic Planning Board, San Juan Veterans Administration Medical Center April, 1991
10. Member, Strategic Educational Council, San Juan Veterans Administration Medical Center Dec. 12, 1991

Participation in National & International Scientific Meetings and Special Lectures:

1. Lecturer: New Aspects in the Management of Stroke, Asociación Médica del Oeste, Annual Conference, March 25, 1984, Presenter.
2. American Academy of Neurology, Annual Meeting, Boston, Massachusetts, 1984.
3. Lecture: Update on Stroke, Monthly Medical Staff Scientific Meeting, San Juan Veterans Medical Center, Sept. 26, 1984, Presenter.
4. Lecturer: Management of Status Epilepticus and Epilepsy During Pregnancy, Continuing Medical Education at Mayagüez Outpatient Clinic, Jan. 25, 1985, Presenter.
5. Lecturer: New Aspects in Alzheimer Dementia, Asociación Médica del Oeste Annual Convention, Oct. 12, 1985, Presenter.
6. Lecture: Clinical Manifestations of Ischemic Stroke, Primer Simposio del Caribe Sobre Enfermedades Cerebrovasculares, Nov. 17, 1985.
7. Lecture: Neurological Manifestations of AIDS, Medical Grand Rounds, San Juan Veterans Medical Center, Nov. 20, 1985, Presenter.
8. American Academy of Neurology, Annual Meeting, New Orleans, LA, 1986.
9. Lecture: Nuevos Adelantos en el Diagnóstico y Manejo de la Neuropatía Diabética, Noveno Curso Post Graduado de Endocrinología y Diabetes, Auspiciado por la Sociedad Puertorriqueña de Endocrinología y Diabetes, May 18, 1986, Presenter.
10. Lecture: New Aspects of Ischemic Stroke; Neurology, Neurosurgery & Neuroradiology Combined Rounds, Aug. 26, 1986, Presenter.
11. Case Discussion at the Spanish American Neurology Seminar, Sept. 9, to 24, 1986, Madrid, Spain. Presenter.

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12. American Academy of Neurology Meeting, New York, NY, 1987.
13. Lecture: New Developments in Partial Complex Seizures; Medical Grand Rounds, San Juan Veterans Medical Center, May 13, 1987, Presenter.
14. Lecture: Evaluation of Patient with Headache; Neurology, Neurosurgery & Neuroradiology Combined Rounds, April 20, 1987, Presenter.
15. Lecture: New Aspects in the Treatment of Headaches; Mayagüez Outpatient Clinic, June 3, 1987, Presenter.
16. Lecture: New Advances in the Management of Cerebral Ischemia; Review Course for Certification in Internal Medicine, University of Puerto Rico School of Medicine, June 16, 1987, Presenter.
17. Lecture: Clinical Manifestations of Cerebral Ischemia; University of Puerto Rico School of Medicine, Residents Training Program, July 2, 1987, Presenter.
18. Lecture: New Advances in the Management of Cerebro Vascular Disease, University of Puerto Rico School of Medicine, Psychiatry Department, Aug. 18, 1987, Presenter.
19. Lecture: Medical & Surgical Treatment of Partial Complex Seizures; Asociación Puertorriqueña de Ayuda al Paciente con Epilepsia, Sept. 16, 1987, Presenter.
20. VII Congreso Panamericano de Neurología, San Juan, Puerto Rico, Oct. 11, to 17, 1987.
21. Lecture: Role of Calcium Channel Blockers in the Management of Cerebral Ischemia; First Annual Course - Neurology for Non-Neurologists; Sponsored by the P. R. Academy of Neurology, San Juan, Puerto Rico, Oct. 16, 1987, Presenter.
22. Lecture: Stroke and Rehabilitation; San Juan Veterans Medical Center, Rehabilitation Medicine Service Residents, Feb. 12, 1988, Presenter.
23. Lecture: Pathophysiology of Ischemia Cerebrovascular Disease; University of Puerto Rico School of Medicine, 4th Year Medical Students, May 3, 1988, Presenter.
24. Lecture: Update on Stroke; University District Hospital Board Review Course, June 13, 1988, Presenter.

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25. Lecture: Medical Management of Ischemic Stroke; University of Puerto Rico School of Medicine, Neurology Training Program, July 6, 1988, Presenter.
26. Lecture: New Approaches in the Treatment of Cerebrovascular Ischemia; San Juan Veterans Administration Hospital, Internal Medicine Program, Aug. 10, 1988, Presenter.
27. Lecture: Psychiatric Aspects of Stroke; Psychiatry Residency Program, Hospital de Psiquiatria, Rio Piedras, Sept. 20, 1988, Presenter.
28. Lecture: Tropical Spastic Paraparesis; San Juan Veterans Medical Center, Nov. 9th, 1988, Presenter.
29. Ischemic Cerebrovascular Disease Journal Club, University of Puerto Rico School of Medicine, Neurology Section, Nov. 11, 1988, Moderator.
30. Lecture: The Neurologic Examination; San Jorge Hospital Junior Faculty, Dec. 9, 1988, Presenter.
31. American Academy of Neurology Annual Meeting, Chicago, Illinois, April 1989.
32. 4th Annual Medical Meeting, Ashford Presbyterian Community Hospital, Medical Faculty, San Jose, Costa Rica, Sept. 1989.
33. Lecture: Sleep Disorders; Diagnosis, Management and Treatment, Academia de Medicos de Familia, San Juan, P. R., Sept. 10, 1989, Presenter.
34. American College of Physicians, Puerto Rico Chapter Annual Meeting, San Juan Puerto Rico, Oct. 1989.
35. Lecture: Medicine in the Tropics; HTLV-I Disease, Tropical Spastic Paraparesis, San Juan Veterans Administration Medical Center, Tropical Medicine Class, Naval School of Health Sciences, Bethesda Detachment, Nov. 7, 1989, Presenter.
36. Lecture: Stroke and Transient Ischemic Attack; Uso de Recursos Diagnostico en las Practica Moderna de la Medicina, Auspiciado por el Ashford Cardiovascular Physiologic and Nuclear Lab, Condado Beach Hotel, April 28, 1990, Presenter.
37. American Academy of Neurology Annual Meeting, Miami, Florida, April/May, 1990.

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38. Lecture: Neurovascular Emergencies; Diagnosis and Management, San Juan Veterans Administration Medical Center, Internal Medicine Training Program, August, 1990, Presenter.
39. 5th Annual Medical Meeting, Ashford Presbyterian Community Hospital, Medical Faculty, Guatemala City, Guatemala, Sept. 1990.
40. Lecture: Parkinson's Disease, Diagnosis and Management, Medical Faculty, Ashford Presbyterian Community Hospital, February 4, 1991, Presenter.
41. Lecture: "An Introduction to the Diagnosis and Treatment of Swallowing Disorders", University of Puerto Rico School of Medicine, Health Related Sciences, February 16-17, 1991.
42. Symposium: Global Perspectives on the Management of Insomnia; Annenberg Center for Health Sciences, Palm Desert, California, World Psychiatric Association, February 21-24, 1991.
43. Lecture: Parkinson's Disease; The Role of Eldepryl in Parkinson's Disease; Academia de Medicos de Familia de Puerto Rico; Conferencia del Caribe en Medicina Diagnostica 1991, Convencion Anual 10 a 17 de marzo, 1991, Presenter.
44. American Academy of Neurology Annual Meeting, Boston Massachusetts, April 1991.
45. Lecture: Pathogenesis of Parkinson's Disease; Medical Grand Rounds, San Juan Veterans Administration Medical Center, May 1, 1991, Presenter.
46. Lecture: Oxidative Reactions in Parkinson's Disease; University of Puerto Rico School of Medicine, Neurology Residents Program, May 9, 1991, Presenter.
47. Lecture: Genetic Considerations in Parkinson's Disease; Academia Puertorriqueña de Neurología, San Juan, PR, May 17, 1991, Presenter.
48. Lecture: HTLV-I Disease in Puerto Rico & the Tropics; San Juan Veterans Administration Medical Center, Tropical Medicine Class, Naval School of Health Sciences, Bethesda Detachment, July 29, 1991, Presenter.
49. Lecture: Differential Diagnosis of Sleep Disorders; "La Vida es Sueño"; Convencion Anual de Sección de Psiquiatría, Neurología & Neurocirugía de la Asociación Médica de Puerto Rico, Hotel Caribe Hilton, San Juan, Puerto Rico, Sept. 19 to 22, 1991, Presenter.

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# Learning Resources:

1. Video: "Vida o Muerte, Tu Decides"; Participant in the Medical and Neurologic Complications of Smoking, by the Non-Smoking Group. San Juan Veterans Medical Center.

# Bibliography:

1. Martínez Maldonado, M., and Garayalde, G.: Renal Involvement in Multiple Myeloma, In: The Kidney in Systemic Disease, 2nd edition. Ed. W. E. Suki and G. Eknoyan, J. Wiley and Sons, New York 1981. pp 197-209
2. Garayalde G.: Neurological Manifestations of AIDS In: AIDS lo Que Todos Debemos Saber Ed. J. Garib and C. Barrio pp. 49-53
3. Abstract - Seizures in Diabetic Non Ketotic Hyperglycemia. American EEG Society - American Epilepsy Society, August 1982.
4. Presence of Human T-Lymphotropic Virus Type 1 Antibodies in Two Patients with Progressive Myelopathy in Puerto Rico. Presented at the American Academy of Neurology Annual Meeting, Poster Presentation, Chicago, Illinois, April 1989.
5. Primary Lateral Sclerosis: A distinct entity in patients with chronic spastic paraparesis, admitted to San Juan Veterans Administration Medical Center from 1963 to 1968. Presented at the American College of Physicians, Puerto Rico Chapter Annual Meeting, San Juan, Puerto Rico, Oct. 28, 1989. Published, El Boletín de la Asociación Médica de Puerto Rico, Aug. 1990, vol. 62 #8, 340-342.
6. Disfagia: Patología, Causas y Evaluaciones; Published, El Flamboyán, Boletín del Capítulo de Puerto Rico Asociación Dietética Americana, June 1991, Num. 1, 1991.
7. Presence of Human T-Lymphotropic Virus Type 1 Antibodies in Two Patients with Progressive Myelopathy, in Puerto Rico. Published, in the journal NEUROLOGY, Sept. 1991, vol. 41, 1515 and 1516.

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Languages:

	<u>Speaking</u>	<u>Writing</u>	<u>Comprehension</u>
English	x	x	x
Spanish	x	x	x

Extracurricular Activities:

1. Member, Rotary Club of Puerto Rico, San Juan Chapter
2. Charter Member, Sociedad de Enófilos de Puerto Rico
3. Member, Cofradia Puertorriqueña del Vino
4. Charter Member, Bacchus
5. Gardening
6. Tennis

References:

1. Dr. Manuel Martinez-Maldonado  
Chief, Medical Services  
Atlanta Veterans Admin.  
Medical Center  
1670 Clairmont Road  
Decatur, Georgia, 30033
2. Dr. Rafael Melendez  
Chief, Neurology Section  
San Juan Veterans Admin. Hospital  
P. R. Box 4867  
San Juan, Puerto Rico 00936
3. Dr. Thomas D. Sabin  
Chief, Neurology Unit  
Boston City Hospital  
818 Harrison Avenue  
Boston, MS 02118

DATE:

3/20/2000

SIGNATURE:

Glenn Gayalde-Cotruoneo